

# **PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY**

**Mobile Tool International (MTI) Insulated Products, Inc.  
9733 Indianapolis Road  
Ft. Wayne, Indiana 46809**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T003-12876-00220	
Issued by: Original Signed by Janet McCabe Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: March 20, 2002  Expiration Date: March 20, 2007

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## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

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The Permittee owns and operates a hydraulic lift equipment manufacturing plant.

Responsible Official:	Robert A. Fieldhouse,
Source Address:	9733 Indianapolis Road, Ft. Wayne, Indiana 46809
Mailing Address:	P.O. Box 9247, Ft. Wayne, Indiana 46899
General Source Phone Number:	(219) 478-4601
SIC Code:	3559
County Location:	Allen
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD; Major Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) paint booth in Building Number 2 for painting assembled hydraulic lift trucks (consisting of steel and fiberglass parts) with a maximum production capacity of 0.25 mobile lift trucks per hour. The method of spray paint application is air atomization using eight (8) spray guns with the over-spray controlled by dry filters, exhausting to four stacks located (identified as B2-NE, B2-SE, B2-NW, and B2-SW) at the corners of the building. This paint booth was constructed in 1977.
- (b) One (1) paint booth in Building Number 4 for primer paint application to fabricated steel boom fixtures and components with a maximum production capacity of 200 fabricated steel parts per hour. The method of spray paint application is air atomization using one (1) spray gun with the over-spray controlled by dry filters, exhausting at two stacks (identified as B4-E and B4-W). This paint booth was constructed in 1995.
- (c) One (1) fiberglass boom and bucket manufacturing area located in Building Number 3 and used to fabricate and paint fiberglass parts using resins, gel coats and paints. The maximum production capacity is 0.33 booms and buckets per hour. Paints and gel coats are applied using one (1) air atomization spray gun located in a spray paint booth constructed in 1980. Resins are applied using a hand lay-up method and may be performed inside or outside the paint booth. Paint, gelcoat, and resin applications cannot be performed simultaneously in the paint booth. The over-spray from the paint booth controlled by dry filters, which exhausts to one stack (identified as B3-GC-1).

### A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Machining where an aqueous cutting coolant continuously floods the machining interface [326 IAC 6-3].

- (b) Cutting 200,000 linear feet or less of one inch plate steel or equivalent [326 IAC 6-3].
- (c) Using 80 tons or less of welding consumables [326 IAC 6-3].
- (d) Activities with emissions less than the thresholds provided in 326 IAC 2-7-1(21) including:
  - (1) One (1) steel grit mechanical blaster enclosed in a blast room located in Building Number 4, with air circulated through an air filter and returned to the blast room [326 IAC 6-3].
  - (2) Miscellaneous dust emissions associated with handling of finished plastic parts, including trimming, cutting, grinding, polishing, buffing, and patching [326 IAC 6-3].
- (e) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment.

**A.4 Part 70 Permit Applicability [326 IAC 2-7-2]**

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## SECTION B

## GENERAL CONDITIONS

### B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

### B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

### B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

### B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

### B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

### B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

**B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]**

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- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provision of this permit is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or
  - (3) Denial of a permit renewal application.
- (b) Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.
- (c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

**B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]**

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- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

**B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]**

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the



shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, or before the date it is due.

- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]  
[326 IAC 1-6-3]

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper

maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

**B.12 Emergency Provisions [326 IAC 2-7-16]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,  
Compliance Section), or  
Telephone Number: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

**B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]**

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

**B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either:
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deletedby this permit.
- (b) All previous registration and permits are superseded by this permit.

**B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

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- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination**  
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.17 Permit Renewal** [326 IAC 2-7-4]

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
  - (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]  
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]  
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

**B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]**

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- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
  
Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]**

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- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

**B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]**

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

**B.21 Source Modification Requirement [326 IAC 2-7-10.5]**

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A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

**B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]



**B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]**

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- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source
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### Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]  
Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- C.2 Opacity [326 IAC 5-1]  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]  
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]  
The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.
- C.5 Fugitive Dust Emissions [326 IAC 6-4]  
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]  
Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.
- C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]
- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
  - (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work

or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
  - (A) Asbestos removal or demolition start date;
  - (B) Removal or demolition contractor; or
  - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

## **Testing Requirements [326 IAC 2-7-6(1)]**

### **C.8 Performance Testing [326 IAC 3-6]**

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

#### **Compliance Requirements [326 IAC 2-1.1-11]**

##### **C.9 Compliance Requirements [326 IAC 2-1.1-11]**

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The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

#### **Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

##### **C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

##### **C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

### **Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

#### **C.12 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]**

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP);

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### **C.13 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]**

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit and an expected timeframe for taking reasonable response steps.
- (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
- (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
- (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
- (4) Failure to take reasonable response steps shall constitute a violation of the permit.

- (c) The Permittee is not required to take any further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating. If monitoring is required by Section D and the equipment is not operating, except for time necessary to perform quality assurance and maintenance activities.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

### **C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6] [326 IAC 2-7-19 (e)]**

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- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements and be used for the purpose of a Part 70 fee assessment:
- (1) Indicate estimated actual emissions of criteria pollutants from the source;
  - (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:
- Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- The emission statement does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

### **C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]**

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- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

### **C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]**

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- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management

Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

### **Stratospheric Ozone Protection**

#### **C.18 Compliance with 40 CFR 82 and 326 IAC 22-1**

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Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.



## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]:

- (a) One (1) paint booth in Building Number 2 for painting assembled hydraulic lift trucks (consisting of steel and fiberglass parts) with a maximum production capacity of 0.25 mobile lift trucks per hour. The method of spray paint application is air atomization using eight (8) spray guns with the over-spray controlled by dry filters, exhausting to four stacks located (identified as B2-NE, B2-SE, B2-NW, and B2-SW) at the corners of the building. This paint booth was constructed in 1977.
- (b) One (1) paint booth in Building Number 4 for primer paint application to fabricated steel boom fixtures and components with a maximum production capacity of 200 fabricated steel parts per hour. The method of spray paint application is air atomization using one (1) spray gun with the over-spray controlled by dry filters, exhausting at two stacks (identified as B4-E and B4-W). This paint booth was constructed in 1995.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 Volatile Organic Compounds (VOC)

- (a) The following limitations apply to the spray paint booth located in Building Number 4:
  - (1) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the daily volume weighted average volatile organic compound (VOC) content of coating applied to metal parts of the hydraulic lift equipment shall be limited to 3.5 pounds of VOCs per gallon of coating less water, as delivered to the applicator for any calendar day, for air dried coatings.
  - (2) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.
- (b) The spray paint booth located in Building Number 2 is not subject to 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) or 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) because this booth was constructed prior to the applicability dates. Any change to this booth requires prior approval from IDEM, OAQ.

#### D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2, the PM from each of the paint booths shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

#### D.1.3 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section C - Preventive Maintenance Plan, of this permit, is required for these emission units and their control devices.

## **Compliance Determination Requirements**

### **D.1.4 Volatile Organic Compounds (VOC)**

Compliance with the VOC content limitation contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

## **Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

### **D.1.5 Particulate Matter (PM)**

The dry filters used for PM control shall be in operation at all times when the paint booths are in operation.

### **D.1.6 Monitoring**

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (B2-NE, B2-SE, B2-NW, B2-SW, B4-E, and B4-W) while the spray booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

## **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

### **D.1.7 Record Keeping Requirements**

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC content limit established in Condition D.1.1.
  - (1) The VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents; and
  - (2) A log of the dates of use.
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]:

- (c) One (1) fiberglass boom and bucket manufacturing area located in Building Number 3 and used to fabricate and paint fiberglass parts using resins, gel coats and paints. The maximum production capacity is 0.33 booms and buckets per hour. Paints and gel coats are applied using one (1) air atomization spray gun located in a spray paint booth constructed in 1980. Resins are applied using a hand lay-up method and may be performed inside or outside the paint booth. Paint, gelcoat, and resin applications cannot be performed simultaneously in the paint booth. The over-spray from the paint booth controlled by dry filters, which exhausts to one stack (identified as B3-GC-1).

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the paint booth shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

#### D.2.2 Emissions from Reinforced Plastics Composites Fabricating Emission Units [326 IAC 20-25]

Pursuant to 326 IAC 20-25, the fiberglass operations shall be subject to the following requirements:

- (a) The Permittee shall comply with the following HAP monomer content standards for resin and gel coat applications on or before January 1, 2002:

Fiber Reinforced Plastic Composite Products	HAP Monomer Content (Weight %)
Resin, Manual or Mechanical application:	
Production Specialty Products	48
Production - Noncorrosion resistant unfilled	35
Production - Noncorrosion resistant filled (\$35% by weight)	38
Tooling	43
Gel Coat Application:	
Production Pigmented	37

<b>Fiber Reinforced Plastic Composite Products</b>	<b>HAP Monomer Content (Weight %)</b>
Clear Production	44
Tooling	45
Production - Pigmented, Subject to American National Standards Institute	45
Production - Clear, Subject to American National Standards Institute	50

- (b) The Permittee shall operate the fiberglass operation in accordance with the following work practice standards:
- (1) Nonatomizing spray equipment shall be operated at pressures that do not atomize the resin and gel coat during the application process;
  - (2) Except for mixing containers, HAP containing materials shall be kept in a closed container when not in use;
  - (3) Solvent sprayed during cleanup and resin changes shall be directed into solvent collection containers;
  - (4) Solvent collection containers shall be kept closed when not in use;
  - (5) Clean-up rags with solvent shall be stored in closed containers;
  - (6) Closed containers shall be used for the storage of the following:
    - (A) All production and tooling resins that contain HAPs;
    - (B) All production and tooling gel coats that contain HAPs;
    - (C) Waste resins and gel coats that contain HAPs;
    - (D) Cleaning materials, including waste cleaning materials; and
    - (E) Any other materials that contain HAPs.
  - (7) All resin and gel coat mixing containers with a capacity equal to or greater than fifty-five (55) gallons shall be fitted with a cover, with no visible gaps, in place at all times except when material is being added or removed from the container, or when mixing or pumping equipment is being placed in or removed from the container.
- (c) The Permittee shall train all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications according to the following schedule:
- (1) All personnel hired after the date of this rule shall be trained within fifteen (15) days of hiring;

- (2) All personnel hired before the effective date of this rule shall be trained or evaluated by a supervisor within thirty (30) days of the effective date of this rule;
- (3) All personnel shall be given refresher training annually; and
- (4) Personnel who have been trained by another source subject to this rule are exempt from the training specified in (2) if written documentation that the employee's training is current is provided to the Permittee.
- (5) If the result of an evaluation shows that training is needed, such training shall occur within fifteen (15) days of the evaluation.

The initial and refresher training shall cover, at a minimum, the appropriate application techniques, equipment cleaning procedures, and equipment setup/adjustment to minimize material usage and overspray.

#### D.2.3 Volatile Organic Compounds (VOCs)

The surface coating operations performed in the paint booth and the resin hand lay-up operations (located in Building Number 3) are not subject to 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) because the potential to emit VOC from each of these facilities is less than twenty-five (25) tons per year. Any proposed changes to the booth and/or resin hand lay-up operation, which would increase the potential to emit VOC from either of these facilities to greater than twenty-five (25) tons per year, shall require prior approval from IDEM, OAQ.

#### D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

### **Compliance Determination Requirements**

#### D.2.5 Particulate Matter (PM)

In order to comply with D.2.1, the dry filter for PM control shall be in operation and control emissions from the paint booth at all times that the paint booth is in operation.

#### D.2.6 Emissions from Reinforced Plastics Composites Fabricating Emission Units [326 IAC 20-25-5]

Compliance with the HAP monomer content and usage limitations in Conditions D.2.2 shall be determined using one of the following methods:

- (a) The manufacturer's certified product data sheet (MSDS);
- (b) The manufacturer's material safety data sheet; or
- (c) Sampling and analysis, using methods approved by the Commissioner

When a MSDS, a certified product data sheet, or other document specifies a range of values, the values resulting in the greatest calculated emissions shall be used for determining compliance with Condition D.2.2.

### **Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

#### D.2.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack (B3-GC-1) while the spray booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take

response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stack (B3-GC-1) and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

### **Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### **D.2.8 Record Keeping Requirements**

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- (a) Pursuant to 326 IAC 20-25, the Permittee shall maintain records of all reports and notifications required by this rule. On and after January 1, 2002, the Permittee shall maintain records that are complete and sufficient to establish compliance with the requirements of this rule. Records maintained shall include purchase orders, invoices, material safety data sheets (MSDS), manufacturer's certified product data sheets, calculations, or other records necessary to confirm compliance. The records shall be maintained for at least five (5) years following the date of each occurrence, measurement, or record. At a minimum, the most recent two (2) years of data shall be retained on site. The remaining three (3) years of data may be retained off site.
- (b) Pursuant to 326 IAC 20-25-8, the Permittee shall maintain the following training records on site and available for inspection and review:
  - (1) A copy of the current training program; and
  - (2) A list of all current personnel, by name, that are required to be trained and the dates of the initial training and the most recent refresher training.
- (c) To document compliance with Condition D.2.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### **D.2.9 Reporting Requirements**

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Pursuant to 326 IAC 20-25, the Permittee submit the following reports:

- (a) On or before June 1, 2001, the Permittee shall submit an initial notification report to the Commissioner. The notification report shall include:
  - (1) The name and address of the owner or operator;
  - (2) The address of the physical location of the source; and
  - (3) A statement verifying that the source is subject to 326 IAC 20-25 signed by the responsible official as set forth in 326 IAC 2-7-1(34).

- (b) On or before March 1, 2002, the Permittee shall submit an initial statement of compliance to the Commissioner, which shall include:
  - (1) The name and address of the owner or operator;
  - (2) The address of the physical location of the source; and
  - (3) A statement signed by the responsible official as set forth in 326 IAC 2-7-1(34), certifying that the Permittee achieved compliance on or before January 1, 2002, the method used to achieve compliance, and that the Permittee is currently in compliance with all requirements of 326 IAC 20-25.
- (c) If the source uses monthly emissions averaging pursuant to 326 IAC 20-25-3(h)(2), the Permittee shall submit a quarterly summary report and supporting calculations.
- (d) The notifications in (a), and (b) above shall be submitted to the address listed in Section C General Reporting Requirements.

## SECTION D.3 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]:

- (a) Machining where an aqueous cutting coolant continuously floods the machining interface [326 IAC 6-3].
- (b) Cutting 200,000 linear feet or less of one inch plate steel or equivalent [326 IAC 6-3].
- (c) Using 80 tons or less of welding consumables [326 IAC 6-3].
- (d) Activities with emissions less than the thresholds provided in 326 IAC 2-7-1(21) including:
  - (1) One (1) steel grit mechanical blaster enclosed in a blast room located in Building Number 4, with air circulated through an air filter and returned to the blast room [326 IAC 6-3].
  - (2) Miscellaneous dust emissions associated with handling of finished plastic parts, including trimming, cutting, grinding, polishing, buffing, and patching [326 IAC 6-3].
- (e) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from each of the enclosed mechanical blaster, brazing equipment, cutting torches, soldering equipment, welding equipment, trimming, grinding, polishing, and buffing activities shall not exceed the pound per hour emission rate based on the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

### Compliance Determination Requirements

#### D.3.2 Particulate Matter (PM)

Pursuant to 326 IAC 6-3-2 (Process Operations), the filter for PM control shall be in operation and control emissions from the enclosed mechanical blaster at all times the mechanical blaster is in operation.



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

### PART 70 OPERATING PERMIT CERTIFICATION

Source Name: MTI Insulated Products, Inc.  
Source Address: 9733 Indianapolis Road, Ft. Wayne, Indiana 46809  
Mailing Address: P.O. Box 9247, Ft. Wayne, Indiana 46899  
Part 70 Permit No.: T003-12876-00220

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Affidavit (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT  
EMERGENCY OCCURRENCE REPORT**

Source Name: MTI Insulated Products, Inc.  
Source Address: 9733 Indianapolis Road, Ft. Wayne, Indiana 46809  
Mailing Address: P.O. Box 9247, Ft. Wayne, Indiana 46899  
Part 70 Permit No.: T 003-12876-00220

**This form consists of 2 pages**

**Page 1 of 2**

- |   |
|---|
| <p><b>9</b> This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none"><li><b>C</b> The Permittee must notify the Office of Air Quality (OAQ), within four <b>(4)</b> business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and</li><li><b>C</b> The Permittee must submit notice in writing or by facsimile within two <b>(2)</b> days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.</li></ul> |
|---|

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

**Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
Compliance Data Section**

**PART 70 OPERATING PERMIT  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: MTI Insulated Products, Inc.  
Source Address: 9733 Indianapolis Road, Ft. Wayne, Indiana 46809  
Mailing Address: P.O. Box 9247, Ft. Wayne, Indiana 46899  
Part 70 Permit No.: T 003-12876-00220

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

**9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.**

**9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD**

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

# Indiana Department of Environmental Management Office of Air Quality

## Addendum to the Technical Support Document for a Part 70 Permit

### Source Background and Description

Source Name: Mobile Tool International (MTI) Insulated Products, Inc.  
Source Location: 9733 Indianapolis Road, Ft. Wayne, Indiana 46809  
County: Allen  
SIC Code: 3559  
Operation Permit No.: T003-12876-00220  
Permit Reviewer: ERG/AB

On November 29, 2001, the Office of Air Quality (OAQ) had a notice published in the Fort Journal Gazette, Ft. Wayne, Indiana, stating that MTI Insulated Products, Inc. had applied for a Part 70 Operating Permit to operate a hydraulic lift equipment manufacturing plant with control. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On December 13, 2001, MTI Insulated Products, Inc. submitted comments on the proposed Part 70 Permit. The comments and OAQ's responses are summarized below:

### Comment 1:

The postal zip code for 9733 Indianapolis Road is 46809. The postal zip code for P.O. Box 9247 is 46899.

Response to Comment 1: As requested by MTI, OAQ has corrected the zip code in Condition A.1 as shown below. OAQ has also corrected the address on the forms provided at the end of the permit.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

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The Permittee owns and operates a hydraulic lift equipment manufacturing plant.

Responsible Official:	Robert A. Fieldhouse,
Source Address:	9733 Indianapolis Road, Ft. Wayne, Indiana <del>46899</del> <b>46809</b>
Mailing Address:	P.O. Box 9247, Ft. Wayne, Indiana 46899
General Source Phone Number:	(219) 478-4601
SIC Code:	3559
County Location:	Allen
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD; Major Source, Section 112 of the Clean Air Act

### Comment 2:

All areas in Building 3 are used in the manufacture of buckets and booms. Most of the work with resins is done outside of the Gel Coat Booth. The application method for resins is hand lay up. Gel Coat application in the booth is via spray layup generally.

Response to Comment 2: IDEM, OAQ has revised the description of the emission units covered in Condition A.1(c) and Section D.2 to clarify the operations conducted in Building Number 3.

The potential to emit VOC from the resin hand lay-up operation, assuming it is conducted in the resin lay-up area outside the paint booth, is 16.6 tons per year. The provisions of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) are not applicable to this facility. Changes to the resin hand lay-up operation that would increase the potential to emit to greater than 25 tons per year would require prior approval from IDEM. Condition D.2.3 has been revised to indicate that both the paint booth and the resin hand lay-up area have potential to emit below 25 tons per year and that changes to either of these facilities may trigger 326 IAC 8-1-6.

#### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

- 
- (c) One (1) **fiberglass boom and bucket manufacturing area located paint booth** in Building Number 3 **and used to fabricate and paint fiberglass parts using resins, gel coats and paints.** ~~for manufacturing and painting fiberglass booms and buckets with a~~ **The maximum production capacity of is 0.33 booms and buckets per hour. The booth is used for either** **Paints and gel coats are applied using one (1) air atomization spray gun located in a spray paint booth constructed in 1980. Resins are applied using a hand lay-up method and may be performed inside or outside the paint booth.** ~~application or spray painting fiberglass parts. These operations~~ **Paint, gel coat, and resin applications cannot be performed simultaneously in the paint booth. The method of application of gel coat and resin is hand lay-up. The method of spray paint application is air atomization using one (1) spray gun with the** **The over-spray from painting booth is controlled by dry filters, which exhausts to one stack (identified as B3-GC-1). This paint booth was constructed in 1980.**
- 

#### D.2.3 Volatile Organic Compounds (VOCs)

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The surface coating operations performed in the paint booth **and the resin hand lay-up operations** (located in Building Number 3) are not subject to 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) because the potential to emit VOC **from each of these facilities** is less than twenty-five (25) tons per year. Any proposed changes to the booth **and/or resin hand lay-up operation**, which would increase the potential to emit VOC **from either of these facilities** to greater than twenty-five (25) tons per year, shall require prior approval from IDEM, OAQ.

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### Comment 3:

By the time a unit is ready for painting in the Building 2 booth, the entire mobile lift truck has been assembled. Painting can include the truck body and/or body parts or sections as well as the bucket and boom attachments.

Response to Comment 3: IDEM, OAQ has revised the description of the painting operations conducted in this paint booth to include the painting of metal truck parts as well as the boom and bucket assembly. Condition A.1(a) and the description in Section D.1 have been revised as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]  
[326 IAC 2-7-5(15)]

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This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) paint booth in Building Number 2 for painting ~~boom and bucket-assembled~~ **hydraulic lift trucks parts** (consisting of steel and fiberglass parts) with a maximum production capacity of 0.25 mobile lift trucks per hour. The method of spray paint application is air atomization using eight (8) spray guns with the over-spray controlled by dry filters, exhausting to four stacks located (identified as B2-NE, B2-SE, B2-NW, and B2-SW) at the corners of the building. This paint booth was constructed in 1977.

**Comment 4:**

It would be appropriate to adjust the narrative section with the above items. Please note that styrene emissions (HAP) from fiberglass operations in Building 3 are not necessarily directly associated with the booth air emission point.

Response to Comment 4: These facts have been noted and appropriate changes have been made to the permit as specified in the responses to comments 2 and 3 above. No changes have been made to the Technical Support Document because OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified to reflect these changes.

1. The IDEM, OAQ, has revised Condition B.15 Deviations from Permit Requirements and Conditions and certain Parametric Monitoring conditions in the D section of the permit to address concerns regarding the independent enforceability of permit conditions [see 40 CFR 70.6(a)(6)(i)]. The Parametric Monitoring conditions have been revised to establish normal operating conditions for the emission unit or control device and to require implementation of the compliance response plan when monitoring indicates operation is outside the normal range. Language that inferred that operating outside of the normal range could be considered by itself to be a deviation was removed. B.15 was revised to remove language that could be considered to grant exemptions from permit requirements and to clarify reporting obligations.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

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- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. ~~Deviations that are required to be reported by an applicable requirement~~ **A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit**, shall be reported according to the schedule stated in the applicable requirement and ~~do~~ **does** not need to be included in this report.



~~The notification by the Permittee~~ **Quarterly Deviation and Compliance Monitoring Report** does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit ~~or a rule. It does not include:~~
  - ~~(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~
  - ~~(2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.~~

~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.~~
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

- 2. Part 70 requires any application form, report, or compliance certification to be certified by the Responsible Official. IDEM, OAQ has revised C.7 Asbestos Abatement Projects to clarify that the asbestos notification does not require a certification by the responsible official, but it does need to be certified by the owner or operator. IDEM, OAQ has revised C.14 Actions Related to Noncompliance Demonstrated by a Stack Test; a certification by the responsible official is required for the notification sent in response to non-compliance with a stack test.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

**The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project.** The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]

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- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

3. The IDEM, OAQ has restructured C.13 to clarify the contents and implementation of the compliance response plan. The name of the condition has changed to better reflect the contents of the condition. The language regarding the OAQ's discretion to excuse failure to perform monitoring under certain conditions has been deleted. The OAQ retains this discretion to excuse failure to perform monitoring under certain conditions has been deleted. The OAQ retains this discretion to excuse minor incidents of missing data; however, it is not necessary to state criteria regarding the exercise of that discretion in the permit. In C.18 (c)(2) "administrative amendment" has been revised to "minor permit modification", because 326 IAC 2-7-11 (a)(7) has been repealed. The title Compliance Monitoring Plan has been changed to Compliance Response Plan throughout the permit.

C.13 Compliance Monitoring **Response Plan - Failure to Take Response Steps Preparation, Implementation , records and Reports** [326 IAC 2-7-5] [326 IAC 2-7-6]

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- (a) The Permittee is required to **prepare** ~~implement: a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:~~

~~(1) This condition;~~

~~(2) The Compliance Determination Requirements in Section D of this permit;~~

~~(3) The Compliance Monitoring Requirements in Section D of this permit;~~

- (4) ~~The Record Keeping and Reporting Requirements in Section C (General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and~~
- (5) ~~A~~ **a** Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. ~~A~~ **CRP's** shall be submitted to IDEM, OAQ upon request ~~and shall be subject to review and approval by IDEM, OAQ.~~ The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, **supplemented from time to time by the Permittee**, and maintained on site, and is comprised of:
- (A)(1) Reasonable response steps that may be implemented in the event that ~~compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and~~ **an expected timeframe for taking reasonable response steps.**
- (B) ~~A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.~~
- (2) **If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.**
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition **as follows:** ~~Failure to take reasonable response steps may constitute a violation of the permit.~~
- (1) **Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or**
- (2) **If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.**
- (3) **If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.**
- (4) **Failure to take reasonable response steps shall constitute a violation of the permit.**

- (c) ~~Upon investigation of a compliance monitoring excursion, the~~ **The Permittee is excused from taking not required to take any** further response steps for any of the following reasons:
- (1) A false reading occurs due to the malfunction of the monitoring equipment **and** ~~This shall be an excuse from taking further response steps providing that~~ prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for ~~an administrative amendment~~ **a minor permit modification** to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) **When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.**
- ~~(d)(e)~~ Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. **The Permittee shall record all instances when response steps are taken.** In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- ~~(e)(f)~~ **Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed at all times when the equipment emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.** If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) ~~At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.~~
4. Conditions B.15 (Deviations from Permit Requirements and Conditions), C.8 (Performance Testing), and C.17 (General Reporting Requirements) incorrectly indicated that the specified reports should be mailed to the "Compliance Branch." These conditions have been corrected to state that the reports should be mailed to the "Compliance Data Section." The "Quarterly Deviation and Compliance Monitoring Report" form located at the end of the permit has also been revised to indicate that this form should be submitted to the "Compliance Data Section" rather than the "Compliance Branch" as indicated on the draft permit.
5. The new rule citation, 326 IAC 2-1.1-9.5, has been added to Condition B.2 - Permit Term.

**B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]**

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This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

6. Condition B.12 - Emergency Provisions paragraphs (a), (b) and (g) have been revised to reflect rule changes to 326 IAC 2-7-16. This section of the rule is now consistent with 40 CFR 70.6(g) and provides an affirmative defense to an action brought for non-compliance with technology based emission limitations only.

**B.12 Emergency Provisions [326 IAC 2-7-16]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, ~~except as provided in 326 IAC 2-7-16.~~
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a ~~health-based~~ or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (g) ~~Operations may continue during an emergency only if the following conditions are met:~~

————— (1) ——— If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) ——— If an emergency situation causes a deviation from a ~~health-based~~ limit, the Permittee may not continue to operate the affected emissions facilities unless:

————— (A) ——— The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

————— (B) ——— Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

————— Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

7. Condition B.14 - Multiple Exceedances has been deleted from this permit, because 326 IAC 2-7-5(1)(E) has been repealed.

**B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]**

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~~Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.~~

8. A new Condition B.14 - Prior Permits Superseded has been added to the permit to implement the intent of the new rule 326 IAC 2-1.1-9.5.

**B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

9. Paragraph (b) has been deleted from Condition B.13 - Permit Shield. Since Condition B.14 - Prior Permits Superseded has been added to the permit, it is not necessary for this statement to be in this condition.

**B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]**

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~~(b) — This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.~~

## **Indiana Department of Environmental Management Office of Air Quality**

### **Technical Support Document (TSD) for a Part 70 Operating Permit**

#### **Source Background and Description**

Source Name: Mobile Tool International (MTI) Insulated Products, Inc.  
Source Location: 9733 Indianapolis Road, Ft. Wayne, Indiana 46809  
County: Allen  
SIC Code: 3559  
Operation Permit No.: T003-12876-00220  
Permit Reviewer: ERG/AB

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from Mobile Tool International (MTI) Insulated Products, Inc. relating to the operation of a hydraulic lift equipment manufacturing plant. The hydraulic lift equipment is installed on trucks purchased from truck manufacturers.

#### **Source Definition**

MTI Insulated Products, Inc. operates two (2) plants in Ft. Wayne, Indiana.

- (a) Plant 1 with Plant ID 003-00220 is located at 9733 Indianapolis Road, Ft. Wayne, Indiana 46809; and
- (b) Plant 2 with Plant ID 003-00037 is located at 4419 Ardmore Avenue, Ft. Wayne, Indiana 46808.

Although both plants are owned and operated by the same company and operated under the same SIC code, the plants are located four miles apart and do not share the same employees or the same materials. Based on this information, IDEM, OAQ has determined that the plants are not collocated.

#### **Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) paint booth in Building Number 2 for painting boom and bucket assembled parts (consisting of steel and fiberglass parts) with a maximum production capacity of 0.25 mobile lift trucks per hour. The method of spray paint application is air atomization using eight (8) spray guns with the over-spray controlled by dry filters, exhausting to four stacks located (identified as B2-NE, B2-SE, B2-NW, and B2-SW) at the corners of the building. This paint booth was constructed in 1977.
- (b) One (1) paint booth in Building Number 4 for primer paint application to fabricated steel boom fixtures and components with a maximum production capacity of 200 fabricated steel parts per hour. The method of spray paint application is air atomization using one (1) spray gun with the over-spray controlled by dry filters, exhausting at two stacks (identified as B4-E and B4-W). This paint booth was constructed in 1995.

- (c) One (1) paint booth in Building Number 3 for manufacturing and painting fiberglass booms and buckets with a maximum production capacity of 0.33 booms and buckets per hour. The booth is used for either gel coat application or spray painting fiberglass parts. These operations cannot be performed simultaneously. The method of application of gel coat and resin is hand lay-up. The method of spray paint application is air atomization using one (1) spray gun with the over-spray from painting controlled by dry filters, exhausting to one stack (identified as B3-GC-1). This paint booth was constructed in 1980.

### **Unpermitted Emission Units and Pollution Control Equipment**

There are no unpermitted facilities operating at this source during this review process.

### **New Emission Units and Pollution Control Equipment**

There are no new emission units proposed at this time.

### **Insignificant Activities**

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million Btu per hour, including: four (4) natural gas-fired make-up air heaters (one (1) located in Building Number 2 (constructed in 1977), two (2) located in Building Number 3 (constructed in 1980), and one (1) located in Building Number 4 (constructed in 1995)), with rated capacities of 3.10, 2.20, 1.75, and 1.5 MMBtu per hour heat input, respectively.
- (b) Combustion source flame safety purging on startup.
- (c) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (d) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (e) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (f) Filling drums, pails, or other packaging containers with lubricating oils, waxes, and greases.
- (g) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.
- (h) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (i) Hand wipe degreasing operations that do not exceed 145 gallons per 12 months, not subject to 326 IAC 20-6.
- (j) Cleaners and solvents characterized as follows:
  - (1) Having vapor pressure equal to or less than 2kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100 EF) or;
  - (2) Having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20 degrees C (68 EF);



the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

- (k) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, and welding equipment.
- (l) Closed loop heating and cooling systems.
- (m) Cutting 200,000 linear feet or less of one inch plate steel or equivalent.
- (n) Using 80 tons or less of welding consumables.
- (o) Operations using aqueous solutions containing less than 1 % by weight of VOCs excluding HAPs.
- (p) Water based adhesives that are less than or equal to 5 % by volume of VOCs excluding HAPs.
- (q) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (r) Heat exchanger cleaning and repair.
- (s) Paved and unpaved roads and parking lots with public access.
- (t) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (u) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (v) Blowdown for any the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (w) On-site fire and emergency response training approved by the department.
- (x) Filter or coalescer media changeout.
- (y) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C.
- (z) Activities with HAP emissions less than 1 ton per year a single HAP and less than 2.5 tons per year for any combination of HAPs:
  - (1) Painting activities associated with maintenance work.
  - (2) Parking lot resealing.
  - (3) Testing of alternative materials, equipment, or procedures for fiberglass or painting operations.
- (aa) Activities with emissions less than the thresholds provided in 326 IAC 2-7-1(21), including:
  - (1) One (1) steel grit mechanical blaster enclosed in a blast room located in Building Number 4, with air circulated through an air filter and returned to the blast room.

- (2) Air compressor operations and maintenance.
- (3) Handling of pressure cylinders, such as welding gases, cutting gases, lift truck fuel cylinders.
- (4) Miscellaneous dust emissions associated with handling of finished plastic parts, including trimming, cutting, grinding, polishing, buffing, and patching.

#### **Air Pollution Control Justification as an Integral Part of the Process**

The company has submitted the following justification such that the air filter be considered as an integral part of the mechanical blaster:

- (a) The mechanical blasting is conducted in an enclosed blast room, where the primary purpose of the filter is to collect blasting media.
- (b) The cost of recovering the shot blast media reduces the amount of media purchased such that the company would operate the filter even if there were no air regulations in place.

IDEM, OAQ has evaluated these justifications and has agreed that the filter is an integral part of the mechanical blaster. Therefore, the permitting level was determined using the potential to emit after the control equipment. Operating conditions in the proposed permit specify that the filter shall be used at all times the mechanical blaster is in operation.

#### **Existing Approvals**

The source has been operating under previous approvals including, but not limited to, the following:

- (a) CP 003-4141-00220, issued on August 21, 1995.
- (b) A 003-10788-00220, issued on August 23, 1999.

All conditions from previous approvals were incorporated into this Part 70 permit.

#### **Enforcement Issue**

- (a) Based on existing approvals, IDEM has determined that MTI should have submitted a Title V or FESOP application when they became subject to 326 IAC 2-7. The source submitted a Title V application on October 19, 2000.
- (b) Under 326 IAC 20-25-7(a), the source was required to submit an initial notification report to IDEM, OAQ by June 1, 2001. The source has not yet submitted this notification.
- (c) IDEM is reviewing these matters and will take appropriate action.

#### **Recommendation**

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on October 19, 2000. Additional information was received on February 8, 2001 and February 13, 2001.

There was no notice of completeness letter mailed to the source.

## Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, pages 1 through 10).

## Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	22.2
PM-10	22.2
SO <sub>2</sub>	0.02
VOC	53.6
CO	3.1
NO <sub>x</sub>	3.7

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Styrene	21.7
Methyl Methacrylate	1.09
Xylene	6.01
Toluene	15.7
Ethyl Benzene	0.55
Methanol	5.73
Methyl Ethyl Ketone	2.4
Hexamethylene Diisocyanate	6.1 x 10 <sup>-3</sup>
Methyl Isobutyl Ketone	0.16
TOTAL	53.3

The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

## Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1994 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	--
PM-10	0

Pollutant	Actual Emissions (tons/year)
SO <sub>2</sub>	0
VOC	43
CO	--
NO <sub>x</sub>	1
HAP (specify)	--

### Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Paint Booth in Building 2	1.19	1.19	0	28.8	0	0	16.6
Paint Booth in Building 3 (Includes Painting and Fiberglass Operations)	0.334	0.334	0	22.86	0	0	22.8
Paint Booth in Building 4	0.231	0.231	0	3.71	0	0	3.31
Total Emissions	1.76	1.76	0	55.4	0	0	42.7

### County Attainment Status

The source is located in Allen County.

Pollutant	Status
PM-10	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Allen County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Allen County has been classified as attainment or unclassifiable for PM-10, SO<sub>2</sub>, CO and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

- (c) Fugitive Emissions  
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

## **Part 70 Permit Conditions**

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

## **Federal Rule Applicability**

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) This source is not subject to the requirements of the New Source Performance Standard (NSPS), 40 CFR 60, Subpart MM - Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations because this NSPS applies to prime coat, guide coat, and topcoat operations for automobile or light-duty trucks having gross weights less than 3,850 kg (8,500 lbs). The minimum gross weight for the MTI trucks is 15,000 lbs.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.
- (d) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants for Wool Fiberglass Manufacturing (326 IAC 14) because this regulation applies only to sources that manufacture wool fiberglass on a rotary spin manufacturing line or on a flame alternation manufacturing line. MTI does not produce wool fiberglass at this plant. The wool fiberglass used in the gel coat operations is purchased from a supplier.

## **State Rule Applicability - Entire Source**

### **326 IAC 1-6-3 (Preventive Maintenance Plan)**

The source submitted a Preventive Maintenance Plan (PMP) on October 31, 2000. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

### **326 IAC 2-6 (Emission Reporting)**

This source is located in Allen County and the potential to emit PM<sub>10</sub>, CO, VOC and NO<sub>x</sub>, and SO<sub>2</sub> is less than one hundred (100) tons per year, therefore, 326 IAC 2-6 does not apply.

### **326 IAC 5-1 (Opacity Limitations)**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 2-4.1-1 (Major Sources of Hazardous Air Pollutants)

This source is not subject to the provisions of 326 IAC 2-4.1-1 because the facilities at this source were constructed prior to July 27, 1997.

**State Rule Applicability - Individual Facilities**

326 IAC 8-2-9 (Miscellaneous Metal Coating)

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicators at the spray booth located in Building Number 4 shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

This emission unit is subject to 326 IAC 8-2-9 because the potential to emit VOC is greater than 15 pounds per day.

Based on the MSDS submitted by the source and calculations made, the spray booth is in compliance with this requirement. (Note that the coating applied in the paint booth located in Building Number 4 is a mixture of S-W White, hardener, and accelerator. These constituents are mixed in the proportions shown on Page 3 of Appendix A. Although some of the individual constituents of the coating have VOC contents greater than 3.5 pounds per gallon, the mixture actually applied has a VOC content of less than 3.5 pound per gallon).

- (b) The paint booth located in building number 3 is not subject to 326 IAC 8-2-9 because this paint booth is not used to paint metal parts.
- (c) The paint booth located in building number 2 is not subject to 326 IAC 8-2-9 because it was constructed prior to 1980 and is not located in Clark, Floyd, Lake or Porter counties.

326 IAC 8-6 (Organic Solvent Emission Limitations)

Although the spray booth located in Building Number 2 was constructed in 1977, the source is not subject to the provisions of 326 IAC 8-6 (Organic Solvent Emission Limitation) because the source does not have a potential to emit VOC of greater than 100 tons per year.

326 IAC 8-1-6 (New Facilities: General Reduction Requirements)

- (a) The paint booth located in Building Number 2 is not subject to the provisions of 326 IAC 8-1-6 because it was constructed prior to the January 1, 1980 applicability date.
- (b) The paint booth located in Building Number 4 is not subject to the provisions of 326 IAC 8-1-6 because the paint booth is subject to 326 IAC 8-2-9 (Miscellaneous Metal Coatings) and the potential VOC emissions are less than 25 tons per year.
- (c) The paint booth located in Building Number 3 is not subject to the provisions of 326 IAC 8-1-6 because the potential to emit volatile organic compounds is less than 25 tons per year. This booth is used for both surface coating operations and fiberglass operations (gel coat lay-up). Note that the emissions from the gel coat operation are 22.9 tons per year. Emissions from surface coating are 11.8 tons per year. However, gel coat lay-up

and surface coating cannot be conducted in the booth simultaneously. The maximum potential to emit VOC for this booth is therefore 22.9 tons per year.

- Note: (1) The painting operations have a potential to emit VOC of less than twenty-five (25) tons per year. Any changes that would increase VOC emissions to greater than twenty-five (25) tons per year requires prior approval from IDEM, OAQ.
- (2) The gel coat lay-up operations (fiberglass operations) are subject to 326 IAC 20-25.

**326 IAC 6-3-2 (Process Operations)**

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from each of the paint booths shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The dry filters shall be in operation at all times the paint booths are in operation, in order to comply with this limit.

**326 IAC 20-25 (Emissions from Reinforced Plastics Composites Fabricating Emission Units)**

Pursuant to 326 IAC 20-25, the fiberglass operations shall be subject to the following requirements:

- (a) The Permittee shall comply with the following HAP monomer content standards for resin and gel coat applications on or before January 1, 2002.

<b>Fiber Reinforced Plastic Composite Products</b>	<b>HAP Monomer Content (Weight %)</b>
Resin, Manual or Mechanical application:	
Production Specialty Products	48
Production - Noncorrosion resistant unfilled	35
Production - Noncorrosion resistant filled (\$35% by weight)	38
Tooling	43
Gel Coat Application:	
Production Pigmented	37
Clear Production	44
Tooling	45
Production - Pigmented, Subject to American National Standards Institute	45
Production - Clear, Subject to American National Standards Institute	50

- (b) The Permittee shall operate the fiberglass operation in accordance with the following work practice standards:
  - (1) Nonatomizing spray equipment shall be operated at pressures that do not atomize the resin and gel coat during the application process;
  - (2) Except for mixing containers, HAP containing materials shall be kept in a closed container when not in use;
  - (3) Solvent sprayed during cleanup and resin changes shall be directed into solvent collection containers;
  - (4) Solvent collection containers shall be kept closed when not in use;
  - (5) Clean-up rags with solvent shall be stored in closed containers;
  - (6) Closed containers shall be used for the storage of the following:
    - (A) All production and tooling resins that contain HAPs;
    - (B) All production and tooling gel coats that contain HAPs;
    - (C) Waste resins and gel coats that contain HAPs;
    - (D) Cleaning materials, including waste cleaning materials; and
    - (E) Any other materials that contain HAPs.
  - (7) All resin and gel coat mixing containers with a capacity equal to or greater than fifty-five (55) gallons shall be fitted with a cover, with no visible gaps, in place at all times except when material is being added or removed from the container, or when mixing or pumping equipment is being placed in or removed from the container.
- (c) The Permittee shall train all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications according to the following schedule:
  - (1) All personnel hired after the date of this rule shall be trained within fifteen (15) days of hiring;
  - (2) All personnel hired before the effective date of this rule shall be trained or evaluated by a supervisor within thirty (30) days of the effective date of this rule;
  - (3) All personnel shall be given refresher training annually; and
  - (4) Personnel who have been trained by another source subject to this rule are exempt from the training specified in (2) if written documentation that the employee's training is current is provided to the Permittee.
  - (5) If the result of an evaluation shows that training is needed, such training shall occur within fifteen (15) days of the evaluation.
  - (6) The initial and refresher training shall cover, at a minimum, the appropriate application techniques, equipment cleaning procedures, and equipment setup/adjustment to minimize usage and overspray.



- Note: (1) This new condition does not supersede any conditions contained in the source's previous air permits. The booth located in Building Number 3 was not previously subject to 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) because the potential to emit VOC was less than twenty-five (25) tons per year. This booth was also not subject to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations) because the booth was not used to paint metal parts.
- (2) Under 326 IAC 20-25-7(a), the source was required to submit an initial notification report to IDEM, OAQ by June 1, 2001. The source has not yet submitted this notification and has been referred to enforcement.

#### 326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from each of the enclosed mechanical blaster, brazing equipment, cutting torches, soldering equipment, welding equipment, trimming, grinding, polishing, and buffing activities shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The filter used for PM control shall be in operation at all times the enclosed mechanical blaster is in operation.

#### 326 IAC 8-3 (Organic Solvent Degreasing Operations)

The degreasing operations are not subject to 326 IAC 8-3 (Organic Solvent Degreasing Operations), because the source performs only hand-wipe degreasing operations.

#### 326 IAC 8-2-2 (Automobile And Light Duty Truck Coating Operations)

This source is not subject to 326 IAC 8-2-2 (Automobile And Light Duty Truck Coating Operations) because the completed trucks have gross weights greater than 8,500 lbs and are not designed specifically for transportation.

### Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

The paint booths located in buildings 2, 3 and 4 have applicable compliance monitoring conditions as specified below:

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (B2-NE, B2-SE, B2-NW, B2-SW, B3-GC-1, B4-E, and B4-W) while the spray booths are in operation. The Compliance Monitoring Plan shall be followed whenever a condition exists which should result in a response step.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step.

These monitoring conditions are necessary because the filters for the paint booths must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

### **Air Toxic Emissions**

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the 1990 Clean Air Act. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Quality (OAQ) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act.
- (b) See attached calculations for detailed air toxic calculations (Appendix A, ie. pages 1 through 11)

### **Conclusion**

The operation of this hydraulic lift equipment manufacturer shall be subject to the conditions of the attached proposed Part 70 Permit No. T003-12876-00220.

## Appendix A: Emissions Calculations

### Natural Gas Combustion Only

MM BTU/HR <100

### Space Heaters for Buildings 2, 3 and 4

Company Name: MTI Insulated Products, Inc.

Address City IN Zip: Ft. Wayne, IN 46809

CP: 003-12876-00220

Plt ID: 00220

Reviewer: ERG/AB

Date: 02/07/01

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

8.55

74.9

(includes four space heaters with heat inputs of 3.10, 2.20, 1.75, and 1.50 MMBTU/hr)

#### Pollutant

Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	7.6	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.3	0.3	0.02	3.7	0.2	3.1

\*PM emission factor is filterable and condensable PM.

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

## Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 2 for HAPs emissions calculations.

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only**

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**MM BTU/HR <100**

**Space Heaters for Buildings 2, 3 and 4**

**HAPs Emissions**

**Company Name: MTI Insulated Products, Inc.**

**Address City IN Zip: Ft. Wayne, IN 46809**

**CP: 003-12876-00220**

**Plt ID: 00220**

**Reviewer: ERG/AB**

**Date: 02/07/01**

**HAPs - Organics**

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	7.864E-05	4.494E-05	2.809E-03	6.741E-02	1.273E-04

**HAPs - Metals**

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	1.872E-05	4.119E-05	5.243E-05	1.423E-05	7.864E-05

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.  
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

**Appendix A: Emissions Calculations  
VOC and Particulate  
From Surface Coating Operations  
In Building Number 2**

**Company Name: MTI Insulated Products, Inc.  
Address City IN Zip: Ft. Wayne, IN 46809  
CP: 003-12876-00220  
Pit ID: 00220  
Reviewer: ERG/AB  
Date: 02/07/01**

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Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
S-W White	10.5	35.00%	0.0%	35.0%	0.0%	51.00%	3.00000	0.250	3.68	3.68	2.76	66.15	12.07	11.21	7.21	50%
Hardener	8.9	25.00%	0.0%	25.0%	0.0%	65.00%	1.00000	0.250	2.23	2.23	0.56	13.38	2.44	3.66	3.43	50%
Accelerator	8.1	98.80%	0.0%	98.8%	0.0%	5.00%	0.06250	0.250	8.03	8.03	0.13	3.01	0.55	0.00	160.65	50%
Cleanup Solvent (Paint Booth)	7.1	75.00%	0.0%	75.0%	0.0%	0.00%	2.00000	0.250	5.35	5.35	2.67	64.17	11.71	0.00		100%

<b>Potential Emissions</b>	<b>6.11</b>	<b>146.71</b>	<b>26.77</b>	<b>14.88</b>
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S-W white, the hardener and the accelerator are mixed prior to application. See page 3 for VOC content (as applied) calculation.

**METHODOLOGY**

Note: Finish coat, hardener, and accelerator are mixed prior to application.

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

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# Appendix A: Emission Calculations

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## HAP Emission Calculations

### In Building Number 2

Company Name: MTI Insulated Products, Inc.

Address City IN Zip: Ft. Wayne, IN 46809

CP#: 003-12876-00220

Plt ID: 00220

Permit Reviewer: ERG/AB

Date: 02/07/01

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % MEK	Weight % Methanol	Weight % HMDI	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	MEK Emissions (ton/yr)	Methanol Emissions (ton/yr)	HMDI Emissions (ton/yr)
S-W White	10.5	3.000000	0.250	0.00%	0.00%	5.00%	0.00%	0.00%	0.00	0.00	1.72	0.00	0.00
Hardener	8.92	1.000000	0.250	0.00%	0.00%	0.00%	0.00%	0.10%	0.00	0.00	0.00	0.00	0.010
Accelerator	8.13	0.062500	0.250	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Cleanup Solvent (Paint Booth)	7.13	2.000000	0.250	17.50%	55.00%	0.00%	22.50%	0.00%	2.73	8.59	0.00	3.51	0.00

S-W white, the hardener and the accelerator are mixed prior to application. See page 3 for VOC content (as applied) calculation.

Total Potential Emissions

**2.73                      8.59                      1.72                      3.51                      0.010**

## METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs

**Appendix A: Emission Calculations**

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**HAP Emission Calculations****In Building Number 2****Company Name: MTI Insulated Products, Inc.****Address City IN Zip: Ft. Wayne, IN 46809****CP#: 003-12876-00220****Plt ID: 00220****Permit Reviewer: ERG/AB****Date: 02/07/01**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % MEK	Weight % Methanol	Weight % HMDI	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	MEK Emissions (ton/yr)	Methanol Emissions (ton/yr)	HMDI Emissions (ton/yr)
S-W White	10.5	3.000000	0.250	0.00%	0.00%	5.00%	0.00%	0.00%	0.00	0.00	1.72	0.00	0.00
Hardener	8.92	1.000000	0.250	0.00%	0.00%	0.00%	0.00%	0.10%	0.00	0.00	0.00	0.00	0.010
Accelerator	8.13	0.062500	0.250	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Cleanup Solvent (Paint Booth)	7.13	2.000000	0.250	17.50%	55.00%	0.00%	22.50%	0.00%	2.73	8.59	0.00	3.51	0.00

S-W white, the hardener and the accelerator are mixed prior to application. See page 3 for VOC content (as applied) calculation.

Total Potential Emissions

**2.73                      8.59                      1.72                      3.51                      0.010****METHODOLOGY**

HAPS emission rate (tons/yr) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs

**Appendix A: Emissions Calculations  
VOC and Particulate**

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**From Surface Coating Operations  
In Building Number 3  
Company Name: MTI Insulated Products, Inc.  
Address City IN Zip: Ft. Wayne, IN 46809  
CP: 003-12876-00220  
Plt ID: 00220  
Reviewer: ERG/AB  
Date: 02/07/01**

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Fiberglass Booms																
Primer	11.2	40.00%	0.0%	40.0%	0.0%	64.00%	1.00000	0.150	4.46	4.46	0.67	16.06	2.93	2.20	6.97	50%
Hardener	9.0	20.00%	0.0%	20.0%	0.0%	72.00%	0.12500	0.150	1.81	1.81	0.03	0.81	0.15	0.30	2.51	50%
Reducer	6.9	100.00%	0.0%	100.0%	0.0%	0.00%	0.25000	0.150	6.92	6.92	0.26	6.23	1.14	0.00		50%
Clean-up Solvent	7.1	75.00%	0.0%	75.0%	0.0%	0.00%	1.00000	0.150	5.35	5.35	0.80	19.25	3.51	0.00		100%
Fiberglass Buckets & Booms																
Finish Paint	10.5	35.00%	0.0%	35.0%	0.0%	51.00%	1.00000	0.100	3.68	3.68	0.37	8.82	1.61	1.49	7.21	50%
Hardener	8.9	25.00%	0.0%	25.0%	0.0%	65.00%	0.12500	0.100	2.23	2.23	0.03	0.67	0.12	0.18	3.43	50%
Clean-up Solvent	7.1	75.00%	0.0%	75.0%	0.0%	0.00%	1.00000	0.100	5.35	5.35	0.53	12.83	2.34	0.00		100%
<b>Potential Emissions</b>											<b>2.69</b>	<b>64.67</b>	<b>11.80</b>	<b>4.17</b>		

**METHODOLOGY**

Note: Finish coat, hardener, and accelerator are mixed prior to application.

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

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**Appendix A: Emission Calculations**  
**HAP Emission Calculations**  
**In Building Number 3**  
**Company Name: MTI Insulated Products, Inc.**  
**Address City IN Zip: Ft. Wayne, IN 46809**  
**CP#: 003-12876-00220**  
**Plt ID: 00220**  
**Permit Reviewer: ERG/AB**  
**Date: 02/07/01**

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Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Ethyl Benzene	Weight % MIBK	Weight % MEK	Weight % Methanol	Weight % HMDI	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	MIBK Emissions (ton/yr)	MEK Emissions (ton/yr)	Methanol Emissions (ton/yr)	HMDI Emissions (ton/yr)
Fiberglass Booms																	
Primer	11.15	1.000000	0.15	9.00%	21.00%	2.00%	2.00%	0.00%	0.00%	0.00%	0.66	1.54	0.15	0.15	0.00	0.00	0.00
Hardner	9.04	0.125000	0.15	10.00%	0.00%	2.00%	0.00%	0.00%	0.00%	0.02%	0.07	0.00	0.01	0.00	0.00	0.00	0.0001
Reducer	6.92	0.250000	0.15	0.00%	0.00%	0.00%	1.00%	40.00%	0.00%	0.00%	0.00	0.00	0.00	0.01	0.45	0.00	0.00
Cleanup Solvent	7.13	1.000000	0.15	17.50%	55.00%	0.00%	0.00%	0.00%	22.50%	0.00%	0.82	2.58	0.00	0.00	0.00	1.05	0.00
Fiberglass Buckets & Booms																	
Finish Paint	10.5	1.000000	0.10	0.00%	0.00%	0.00%	0.00%	5.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.23	0.00	0.00
Hardener	8.92	0.125000	0.10	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.10%	0.00	0.00	0.00	0.00	0.00	0.00	0.0005
Clean-up Solvent	7.13	1.000000	0.10	17.50%	55.00%	0.00%	0.00%	0.00%	22.50%	0.00%	0.55	1.72	0.00	0.00	0.00	0.70	0.00

Total Potential Emissions

**2.10      5.83      0.16      0.16      0.68      1.76      0.0006**

**METHODOLOGY**

HAPS emission rate (tons/yr) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs

**Appendix A: Emissions Calculations  
VOC and Particulate  
From Surface Coating Operations  
In Building Number 4**

**Company Name: MTI Insulated Products, Inc.  
Address City IN Zip: Ft. Wayne, IN 46809  
CP: 003-12876-00220  
Plt ID: 00220  
Reviewer: ERG/AB  
Date: 02/07/01**

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Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency
Primer	12.4	26.00%	0.0%	26.0%	0.0%	55.00%	0.00072	200.000	3.22	3.22	0.46	11.12	2.03	2.89	5.85	50%
Cleanup Solvent (Paint Booth)	7.1	75.00%	0.0%	75.0%	0.0%	0.00%	0.00036	200.000	5.35	5.35	0.39	9.24	1.69	0.00		100%

<b>Potential Emissions</b>	<b>0.85</b>	<b>20.36</b>	<b>3.71</b>	<b>2.89</b>
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Surface Coating of Fabricated Steel Parts.

**METHODOLOGY**

Note: Finish coat, hardener, and accelerator are mixed prior to application.

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) \* Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) \* Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \* (8760 hrs/yr) \* (1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

surcoat.wk4 9/95

**Appendix A: Emission Calculations**  
**HAP Emission Calculations From Surface Coating Operations**  
**In Building Number 4**

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**Company Name: MTI Insulated Products, Inc.**  
**Address City IN Zip: Ft. Wayne, IN 46809**  
**CP#: 003-12876-00220**  
**Plt ID: 00220**  
**Permit Reviewer: ERG/AB**  
**Date: 02/07/01**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Ethyl Benzene	Weight % Methanol	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	Methanol Emissions (ton/yr)
Primer	12.37	0.000720	200.00	10.00%	0.00%	5.00%	0.00%	0.78	0.00	0.39	0.00
Cleanup Solvent (Paint Booth)	7.13	0.000360	200.00	17.50%	55.00%	0.00%	22.50%	0.39	1.24	0.00	0.51

Total Potential Emissions	<b>1.17</b>	<b>1.24</b>	<b>0.39</b>	<b>0.51</b>
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**METHODOLOGY**

HAPS emission rate (tons/yr) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs

**Appendix A: Emission Calculations**  
**HAP Emission Calculations for Fiberglass Molding Operations**  
**In Building Number 3**  
**Company Name: MTI Insulated Products, Inc.**  
**Address City IN Zip: Ft. Wayne, IN 46809**  
**CP#: 003-12876-00220**  
**Plt ID: 00220**  
**Permit Reviewer: ERG/AB**  
**Date: 02/07/01**

Material	% Styrene	% Methyl Methacrylate	% VOC	Maximum (units/year)	Amount of Material (lbs/unit)	Maximum Usage (lbs/year)	Styrene EF (lbs/ton)	Styrene Emissions (lbs/year)	Styrene Emissions (tons/year)	Methyl Methacrylate EF (lbs/ton)	Methyl Methacrylate Emissions (lbs/year)	Methyl Methacrylate Emissions (tons/year)	VOC Emissions (tons/year)
Gelcoat 6200DX	26.20%	3.00%	29.75%	2125	10.00	21,250	231	2,454	1.23	45	478	0.24	1.52
Gelcoat 944X064	36.30%	5.00%	41.38%	1750	20.00	35,000	356	6,230	3.12	75	1,313	0.66	3.79
Gelcoat 948NT197	35.50%	5.00%	40.06%	2125	5.00	10,625	336	1,785	0.89	75	398	0.20	1.07
COR 61 AA 190W	38.90%	0.00%	38.90%	2125	144.00	306,000	117	17,901	8.95	0	0	0.00	8.95
COR 61 AA 30C	40.00%	0.00%	40.00%	1750	140.00	245,000	123	15,068	7.53	0	0	0.00	7.53
COR 75 AQ	47.00%	0.00%	47.00%			2,000	163	163	0.08	0	0	0.00	0.08
Composites One	43.00%	0.00%	43.00%			300	501	75	0.04	0	0	0.00	0.04
Totals					319.00	617,875.00		43,437.88	21.72		2,189.06	1.09	22.86

Emission Factors are from EPA's "Unified Emission Factors for Open Molding of Composites"

**METHODOLOGY**

HAPS emission rate (tons/yr) = Amount of Material (lbs/unit) \* Maximum (unit/yr) \* (1ton/2000 lbs) \* Emission Factor (lbs/ton) \* (1 ton/ 2000lbs)

VOC Emissions (tons/year) = (Amount of Material applied)\*(weight% non-HAP) + HAP emissions [Note: This assumes that all the volatile non-HAP and only part of the volatile HAP is emitted.]